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Attorneys for Plaintiffs, AMERICAN STEEL &
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THOMAS VOLLRATH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN STEEL & STAIRWAYS, INC.;)	Case No. 12 cv 3103 JST
MARTIN VOLLRATH, an individual; and)	
THOMAS VOLLRATH, an individual,)	[The Honorable Jon S. Tigar]
)	
Plaintiffs,)	STIPULATION AND PROPOSED
)	ORDER VACATING REMAINING
v.)	CASE DEADLINES
)	
LEXINGTON INSURANCE COMPANY, a)	
Delaware corporation; THE INSURANCE)	
COMPANY OF THE STATE OF)	
PENNSYLVANIA, a Pennsylvania)	
corporation; and DOES 1 through 100,)	
inclusive,)	
)	
Defendants.)	

Pursuant to Civil Local Rules 6-1 and 6-2 of the Northern District of California, Plaintiffs American Steel & Stairways, Inc. ("American Steel"), Martin Vollrath and Thomas Vollrath (collectively, "Plaintiffs") and Defendants Lexington Insurance Company ("Lexington") and Insurance Company of the State of Pennsylvania ("ISOP"), collectively, with Plaintiffs, the "Parties," by their undersigned attorneys, hereby stipulate and agree as follows:

1. The Parties participated in mediation with mediator Anne Goyette on January 28, 2014, and following the mediation entered into a term sheet for settlement of the case. The terms

of the settlement will be confidential. A settlement agreement is in the process of being drafted, and it is expected that the settlement will be concluded within the next 90 days.

2. The matter currently has the following case deadlines:

- a. Expert disclosures: March 21, 2014
- b. Expert rebuttal: April 4, 2014
- c. Expert discovery cutoff: April 18, 2014
- d. Filing of dispositive motions: May 9, 2014
- e. Pretrial conference statement: July 22, 2014
- f. Pretrial conference: August 1, 2014
- g. Jury trial: August 18, 2014

3. The Parties would like to vacate the remaining deadlines, and schedule this matter for a status conference in May 2014 to report on the settlement. If the settlement is concluded before then, it is the Parties' intention to present the Court with a stipulation for dismissal at that time.

NOW, THEREFORE, the Parties hereby stipulate to vacate the remaining case deadlines, and to schedule a status conference in May 2014 or at whatever time the Court deems appropriate based on the Court's calendar.

IT IS SO AGREED AND STIPULATED.

DATED: January 31, 2014

DATED: January 31, 2014

SEDGWICK LLP

WILLOUGHBY, STUART & BENING

By: /s/ Traci M. Ribeiro
Traci M. Ribeiro

By: /s/ Alexander F. Stuart
Alexander F. Stuart

Attorneys for Defendants LEXINGTON
INSURANCE COMPANY, INSURANCE
COMPANY OF THE STATE OF
PENNSYLVANIA and CHARTIS CLAIMS, INC.

Attorneys for Plaintiffs AMERICAN STEEL &
STAIRWAYS, INC., MARTIN VOLLRATH and
THOMAS VOLLRATH

ORDER

The Court hereby orders that the remaining case deadlines are vacated, and that the Parties shall appear, through their counsel, on May 21, 2014, for a status conference to report on the status of the settlement of this case, but only in the event that a stipulation for dismissal has not been presented to the Court before that date.

DATED: February 4, 2014


HONORABLE JON S. TIGAR
UNITED STATES DISTRICT COURT JUDGE